

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Food Lion, LLC, and Maryland and Virginia
Milk Producers Cooperative Association,
Inc.

Plaintiffs,

v.

Dairy Farmers of America, Inc.,

Defendant.

Case No. 1:20-cv-00442

**JOINT MOTION FOR ENTRY OF A STIPULATED
PROTECTIVE ORDER AND RULE 502(d) ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Rule 502(d) of the Federal Rules of Evidence, and Local Rule 26.2, Plaintiffs Food Lion, LLC and Maryland and Virginia Milk Producers Cooperative Association, Inc. and Defendant Dairy Farmers of America, Inc. request entry of a stipulated Protective Order (attached as Exhibit A) and Rule 502(d) Order (attached as Exhibit B) specifying required methods for the release and use of certain confidential and privileged documents and information, as well as procedures for the filing of documents under seal. In accordance with Local Rule 7.3, the basis for the parties' joint motion is set forth in a separately filed brief.

Respectfully submitted this 26th day of August 2020.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the users registered on the CM/ECF system.

August 26, 2020

/s/ Ryan G. Rich
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